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Counsel for Defendant
QUINTIN JEUH CARLOS-BANUELOS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

QUINTIN JEUH CARLOS-
BANUELOS, ET AL.,

Defendants

Case No. 1:20-CR-00175-DAD-BAM

**STIPULATION MODIFYING CONDITIONS
OF RELEASE; ORDER**

JUDGE: Hon. ERICA P. GROSJEAN
United States Magistrate Judge

IT IS HEREBY STIPULATED by the parties through their respective counsel KATHLEEN A. SERVATIUS, Assistant United States Attorney for plaintiff United States of America and VICTOR M. CHAVEZ, attorney for defendant Quintin Jauh Carlos-Banuelos that the conditions of release set by the court in the Northern District of California on October 8, 2020 in case no. 5:20-mj-71403-MAG, Doc. 6, may be modified to allow Mr. Carlos-Banuelos to relocate his residence from East Palo Alto, California to Portland, Oregon. Defendant and his third party custodian, his girlfriend, Aida Millan Cervantes are currently living with her parents. Defendant wishes to relocate to Portland, Oregon where he and his third party custodian would live with defendant's brother, Fernando Carlos-Banuelos and his wife Patricia Carlos. Ms. Carlos is a surety on defendant's appearance bond. Moving to Portland would afford defendant a better living situation and the support of his brother and sister in law which would include opportunity for employment. Pretrial Services Officer Elba Romero who has been supervising defendant in the Northern District supports defendant's relocation to Portland, Oregon. This case was recently

1 assigned to a Pretrial Officer in this district, Melissa Haberer from Sacramento Pretrial
2 Services. On November 17, 2020 she indicated that she had no position relative to the modification
3 being sought. The parties stipulate to the following modifications of defendant's conditions of
4 release:

5 (1) Defendant shall reside at the home of Fernando Carlos-Banuelos and his wife Patricia
6 Carlos in Portland, Oregon. Mr. Carlos is defendant's brother and defendant's sister in
7 law, Patricia Carlos is also a surety on defendant's appearance bond. Defendant shall
8 not relocate to Oregon until advised by his current Pretrial Services Officer, Elba
9 Romero, that supervision has been established in Portland, Oregon and that he may
10 move;

11 (2) Defendant shall remain in the third party custody of Aida Millan Cervantes at the
12 residence in Portland, Oregon, as they will reside together at the approved address;

13 (3) Defendant shall reside at the approved address in Portland, Oregon and shall limit his
14 travel to the District of Oregon except for travel to the Northern District of California
15 and the Eastern District of California which shall require prior approval by his Pretrial
16 Services Officer.

17 All other conditions of release previously imposed shall remain in full force and effect.

18 IT IS SO STIPULATED.

19
20 Respectfully submitted,

21 Dated: November 11, 2020

/s/ Victor M. Chavez
VICTOR M. CHAVEZ
Attorney for Defendant

22
23
24 Dated: November 11, 2020

/s/ Kathleen A. Servatius
KATHLEEN A. SERVATIUS
Assistant U.S. Attorney for Plaintiff

ORDER

The Court having considered the stipulation of the parties hereby approves the stipulation and modifies the conditions of release as follows: (1) defendant may relocate to Portland, Oregon and reside at the home of Fernando Carlos-Banuelos and his wife Patricia Carlos. Defendant shall not move to Oregon until Pretrial Services authorizes him to travel; (2) Defendant shall remain in the third party custody of Aida Millan Cervantes and shall reside with her at the approved address in Portland, Oregon; (3) Defendant shall limit his travel to the District of Oregon except for travel to the Northern and Eastern Districts of California which shall require prior approval by his Pretrial Services Officer. All other conditions of release previously imposed shall remain in full force and effect.

IT IS SO ORDERED.

Dated: **November 18, 2020**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE